

1 NATHAN SHAPIRO
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6 Email: nylairchief@gmail.com
7 Defendant in Proper Person

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PAUL PONOMARENKO, an individual,

Plaintiff,

vs.

PROJECT VEGAS MANSION, corporate
entity of unknown form, NATHAN
SHAPIRO, an individual; and DOES 1
through 50,

Defendants.

NATHAN SHAPIRO, an individual,

Counterclaimant,

vs.

PAUL PONOMARENKO, an individual,
DOES 1 through 50 and ROE business
entities 51 through 100,

Counterdefendants.

NATHAN SHAPIRO, an individual,

Third Party Plaintiff,

vs.

SUMMIT ESTATE, INC. DBA SUMMIT
ESTATE RECOVERY CENTER, a
California corporation, DOES 1 through
50 and ROE business entities 51 through
100,

Third Party Defendants.

Case No.: 2:18-cv-00216-RFB-CWH

MOTION FOR OST PER LR IA 6-1 IN RE:
MOTION FOR LEAVE OF COURT TO NAME
ADDITIONAL PARTY AND TO ASSERT
ADDITIONAL CAUSES OF ACTION
PURSUANT TO FED.R.CIV.P. 15(a)(2) and
19(a)(1)(A); MEMORANDUM OF POINTS
AND AUTHORITIES IN SUPPORT THEREOF

FIRST REQUEST

1 **COMES NOW**, Defendant NATHAN SHAPIRO (hereinafter “Shapiro”) and hereby
2 respectfully submits his Motion for Order Shortening Time Pursuant to LR IA 6-1 in re: Motion for
3 Leave of Court to Name an Additional Party and to Assert Additional Causes of Action Pursuant to
4 Fed.R.Civ.P. 15(a)(2) and Fed.R.Civ.P. 19(a)(1)(A); Memorandum of Points and Authorities in
5 Support Thereof [ECF 91]. Shapiro’s motion is based upon the pleadings in this case as well as that
6 mentioned Motion for Leave [ECF 91], the following Memorandum of Points and Authorities, the
7 attached Declaration of Shapiro, and such additional matters as may be judicially noticed or properly
8 come before this Court. Due to the time constraints in the Honorable Beth Labson Freeman’s Order
9 [ECF 88] entered February 5, 2018, *inter alia*, transferring venue to this Honorable Court and setting
10 a deadline of March 7, 2018 in which Shapiro may file an amended counterclaim and amended third-
11 party complaint, an expeditious adjudication of this Motion is *most* respectfully requested.

Dated: February 20, 2018

NATHAN SHAPIRO
By: /s/Nathan Shapiro
6166 S. Sandhill Road
Suite 146
Las Vegas, NV 89120
Telephone: (212) 777-0002
Facsimile: (702) 522-6069
Defendant in Proper Person

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1 **DECLARATION OF NATHAN SHAPIRO PURSUANT TO 28 U.S.C. 1746 IN SUPPORT**
2 **OF MOTION FOR ORDER SHORTENING TIME PURSUANT TO LR IA 6-1 IN RE:**
3 **MOTION FOR LEAVE OF COURT TO NAME ADDITIONAL PARTY AND TO**
4 **ASSERT ADDITIONAL CAUSES OF ACTION PURSUANT TO FED.R.CIV.P. 15(a)(2)**
5 **and 19(a)(1)(A); MEMORANDUM OF POINTS AND AUTHORITIES**
6 **IN SUPPORT THEREOF**

7 NATHAN SHAPIRO declares as follows:

8 1. I am an adult and am competent to make the following declaration and statements
9 of fact of my own personal knowledge, except as to those statements made upon information and
10 belief, and as to those matters, I believe them to be true.

11 2. On February 5, 2018, The Honorable United States District Judge Beth Labson
12 Freeman of the Northern District of California entered an Order transferring the above-captioned
13 litigation to the District of Nevada [ECF 88].

14 3. Contained in Judge Freeman's February 5, 2018 Order was the deadline for your
15 declarant to file his amended counterclaim and amended third-party complaint by March 7, 2018.

16 4. In the event that the Motion for Leave of Court to Name Additional Party and to
17 Assert Additional Causes of Action Pursuant to Fed.R.Civ.P. 15(a)(2) and 19(a)(1)(A);
18 Memorandum of Points and Authorities [ECF 91] is heard in the ordinary course according to the
19 Federal Rules of Civil Procedure, the adjudication thereof will of necessity be well past March 7,
20 2018.

21 5. Your declarant's proposed amended counterclaim and proposed amended third-party
22 complaint are extremely meritorious, and in the interests of substantial justice should be adjudicated
23 as part of this overall litigation.

24 6. Accordingly, an Order Shortening Time on the Motion for Leave of Court to Name
25 Additional Party and to Assert Additional Causes of Action Pursuant to Fed.R.Civ.P. 15(a)(2) and
26 19(a)(1)(A); Memorandum of Points and Authorities [ECF 91] is warranted, just and proper under
27 the totality of the circumstances, and is therefore respectfully requested.

1 7. That pursuant to the provisions of 28 U.S.C. 1746, I hereby declare under penalty
2 of perjury pursuant to the laws of the United States of America that the foregoing is true and correct
3 of my own personal knowledge, except as to those statements made upon information and belief,
4 and as to those matters, I believe them to be true.

/s/ Nathan Shapiro
NATHAN SHAPIRO

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 21st day of February, 2018, I served a true and accurate copy of the foregoing through the Court's CM/ECF system, and via email, to the following parties:

SANJIV N. SINGH, ESQ.
ssingh@sanjivnsingh.com

MICHAEL INDRAJANA, ESQ.
michael@indrajana.com

Attorneys for Plaintiff

/s/ Nathan Shapiro
NATHAN SHAPIRO